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 and Gregory J. Roembke*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EMULAIT, INC. f/k/a PROXAMAMA, INC.,

 Plaintiff,

 vs.

 ROEMBKE TURNKEY SOLUTIONS, LLC,
 ROEMBKE MFG. & DESIGN, INC., and
 GREGORY J. ROEMBKE,

 Defendants.

Case No. 2:24-cv-02267-APG-NJK

**STIPULATION TO EXTEND DEADLINE
 TO REPLY IN SUPPORT OF
 DEFENDANTS' MOTION TO DISMISS
 OR TO TRANSER [ECFs. 16 and 17]**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Defendants Roembke Turnkey Solutions, LLC ("RTS"), Roembke Mfg. & Design, Inc. ("Roembke Mfg."), and Gregory J. Roembke ("Mr. Roembke" and collectively "Defendants") and Plaintiff Emulait, Inc. f/k/a Proxamama, Inc. ("Plaintiff" and all collectively as "the parties"), hereby stipulate and agree to

1 modify the briefing schedule on Defendants' Motion to Dismiss or to Transfer ("Motions") [ECFs.
2 16 and 17] as follows:

3 1. On December 6, 2024, Plaintiff filed its Complaint. ECF 1.

4 2. On December 13, 2024, Defendants were served with summons and Complaint.
5 ECF 11.

6 3. The deadline for Defendants to respond to the Complaint was on or before
7 January 3, 2025. Fed. R. Civ. P. 12.

8 4. On January 3, 2025, the Court entered an Order approving the parties' fourteen
9 (14) additional days to respond to the complaint on or before January 17, 2025. ECF 15.

10 5. On January 17, 2025, Defendants filed their Motions. ECFs 16 and 17.

11 6. The deadline for Plaintiff to respond to the Motions was January 31, 2025. LR 7-
12 2(b).

13 7. On January 29, 2025, the Court entered an Order approving the parties'
14 stipulation allowing Plaintiff fourteen (14) additional days to respond to the Motions on or before
15 February 11, 2025. ECF 25.

16 8. On February 11, 2025, Plaintiff filed its Opposition to the Motions. ECF 37.

17 9. The deadline for Defendants to reply to the Motions is February 18, 2025. LR 7-
18 2(b).

19 10. The parties agree that a seven-day extension for Defendants to reply is warranted.
20 Good cause exists given the extensive and detailed briefing to date on the court's jurisdiction,
21 with 40 pages of briefing and multiple exhibits by both sides. The additional requested time will
22 allow Defendants to adequately and appropriately reply to the opposition
23
24

11. This is the first request for an extension of time to file a reply in support of the motions. This request is in the spirit of judicial efficiency and not intended to case delay or prejudice any party.

Dated: February 13, 2025

Dated: February 13 , 2025

KAEMPFER CROWELL

FOX ROTHSCHILD LLP

By: /s/ Louis M. Bubala III

By: /s/Rex D. Garner

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IT IS SO ORDERED.

ANDREW P. GORDON

CHIEF U.S. DISTRICT JUDGE

DATED: February 18, 2025